

# Exhibit 4

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHELLE MARINO, DEBORAH  
ESPARZA, MONICA RAEL, and  
CERA HINKEY, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

COACH, INC.,

CASE NO.:

1:16-cv-01122-VEC (OTW) (Lead)

Consolidated Member Case Nos.:

1:16-cv-03773-VEC (OTW)

1:16-cv-03677-VEC (OTW)

1:16-cv-05320-VEC (OTW)

**DECLARATION OF CHARLES D. MOORE**

I, Charles D. Moore, declare as follows:

1. I am one of the counsel for the Plaintiffs in this case. I submit this affidavit in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement.

2. The facts contained in this Affidavit are within my personal knowledge, and I could testify to those facts if called to do so under oath.

3. I was first admitted to practice law in 2014 in Minnesota. (Bar No. 396066). I have been admitted pro hac vice in this matter.

4. I am a graduate of Hamline University School of Law (J.D., 2014) and University of North Dakota (B.A., 2007).

5. I have been in private practice since 2014, and a large portion of my practice has involved litigation on behalf of consumers, representing individuals and classes injured by deceptive advertising on consumer products, violations of the Fair Credit Reporting Act, violations of the Truth in Lending Act, and other unfair and deceptive business practices.

6. Over the past seven years, I have gained substantial experience handling complex civil litigation and class action litigation.

7. I was lead counsel from Halunen Law in this case. As reflected below, my time accounts for 84.1% of our firm's time billed to this matter.

8. I have been actively involved in multiple actions in which Halunen Law was named Class Counsel or Settlement Class Counsel, including *Luib v. Henkel Consumer Goods*, Court File No. 1:17-cv-03021-BMC (E.D.N.Y.); *Rapaport-Hecht v. Seventh Generation, Inc.*, Court File No. 14-CV-9087 (KMK) (S.D.N.Y.); *Baharestan et al. v. Venus Laboratories, Inc. d/b/a Earth Friendly Products, Inc.*, Court File No. 3:15-cv-03578-EDL (N.D. Cal.); and *Frohberg et al. v. Cumberland Packing Corp.*, Court File No. 1:14-cv-00748-KAM-RLM (E.D.N.Y.). The *Luib* action litigation involved the deceptive labeling of cleaning products, and resulted in monetary and injunctive relief. The *Rapaport-Hecht* litigation resulted in a settlement of \$4,500,000 for the deceptive marketing of cleaning products. The *Baharenstan* action involved the deceptive marketing of home care and cleaning products, and resulted in monetary relief as well as significant changes to the products' labels and formulations. The *Frohberb* action involved the deceptive marketing of food products and resulted in the monetary relief and significant changes to the products' labels.

9. Halunen Law has also been named Class Counsel, Lead Counsel, or Settlement Class Counsel in consumer class actions styled *Luib v. Henkel Consumer Goods*, Court File No. 1:17-cv-03021-BMC (E.D.N.Y.); *Rapaport-Hecht v. Seventh Generation, Inc.*, Court File No. 14-CV-9087 (KMK) (S.D.N.Y.); *Martin et al. v. Cargill, Inc.*, Court File No. 1:14-cv-00218-LEK-BMK (D. Haw.); *Gay et al. v. Tom's of Maine, Inc.*, Court File No. 0:14-cv-60604-KMM (S.D. Fla.); *Barron v. Snyder's-Lance, Inc.*, 0:13-cv-62496-JAL, (S.D. Fla.); *Frohberg et al. v. Cumberland Packing Corp.*, Court File No. 1:14-cv-00748-KAM-RLM; *Baharestan et al. v. Venus Laboratories, Inc. d/b/a Earth Friendly Products, Inc.*, Court File No. 3:15-cv-03578-EDL (N.D. Cal.); *In re: IKO Roofing Shingle Products Liability Litig.*, Court No. 09-md-2104 (C.D. Ill.); *In re Santa Fe Natural Tobacco Co. Mktg & Sales Practices Litig.*, Court File No. 1:16md2695 (D.N.M.).

10. Christopher J. Moreland is a partner in the Firm with more than 25 years of litigation experience. Mr. Moreland worked on this matter. He is licensed in several state and federal courts around the country and has been appointed class counsel in numerous class actions.

<u>Name</u>	<u>Position</u>	<u>Total Hours</u>	<u>Adjusted Rate</u>	<u>Lodestar</u>
Charles D. Moore	Associate	317.40	\$550	\$174,570
Christopher J. Moreland	Partner	31.40	\$800	\$25,120
Jennifer Seltz	Paralegal	28.20	\$200	\$5,640
TOTAL		377.4		\$205,570

11. The above chart was prepared from contemporaneous detailed daily time records regularly prepared and maintained by Halunen Law utilizing timekeeping software to which all employees have access. In my opinion, the time spent by attorneys and staff of Halunen Law was reasonable and necessary. Indeed, by prosecuting this case purely on a contingency basis and not being paid by the hour, Halunen Law attorneys and staff worked efficiently and avoided unnecessary work. The detailed time and expense entries are available to the Court *in camera* upon request.

12. Halunen Law incurred \$6689.92 in unreimbursed case-related expenses, including expenses related to filing, travel, copying, and case administration. Expenses are accounted for and billed separately and are not duplicated in my firm's professional billing rate. Halunen Law has not received reimbursement for expenses incurred in connection with this litigation. The actual expenses incurred in the prosecution of this case is reflected on the computerized accounting records of my firm prepared by bookkeeping staff, based on receipts and check records, and accurately reflect all actual expenses incurred. These expenses were necessary to prosecuting litigation of this size and complexity on behalf of the Settlement Class, and they are typical of expenses regularly awarded in large-scale class actions. Indeed, because Halunen Law was responsible for advancing all expenses incurred, Halunen Law had a strong incentive not to spend any funds unnecessarily.

13. The hourly rates are based on the typical hourly rates for lawyers of similar experience in the communities in which Class Counsel practice.

14. The hourly rates shown for the attorneys at Halunen Law are our 2020-2021 rates charged as delineated by the Adjusted Laffey Matrix (<http://www.laffeymatrix.com/>), which provides market rates for attorneys working in the Washington, D.C. area. *See, e.g., DL v. Dist. of Columbia*, 924 F.3d 585 (D.C. Cir. 2019) (discussing the history and basis of the Laffey matrix). Although the Adjusted Laffey Matrix is updated annually, courts have awarded attorneys' fees consistent with the Adjusted Laffey Matrix to my firm in a number of cases. *See, e.g., KLuib v. Henkel Consumer Goods*, Court File No. 1:17-cv-03021-BMC (E.D.N.Y.); *Rapaport-Hecht v. Seventh Generation, Inc.*, Court File No. 14-CV-9087 (KMK) (S.D.N.Y.); *Martin et al. v. Cargill, Inc.*, Court File No. 1:14-cv-00218-LEK-BMK (D. Haw.); *Gay et al. v. Tom's of Maine, Inc.*, Court File No. 0:14-cv-60604-KMM (S.D. Fla.); *Barron v. Snyder's-Lance, Inc.*, 0:13-cv-62496-JAL, (S.D. Fla.); *Frohberg et al. v. Cumberland Packing Corp.*, Court File No. 1:14-cv-00748-KAM-RLM; *Baharestan et al. v. Venus Laboratories, Inc. d/b/a Earth Friendly Products, Inc.*, Court File No. 3:15-cv-03578-EDL (N.D. Cal.); *In re: IKO Roofing Shingle Products Liability Litig.*, Court No. 09-md-2104 (C.D. Ill.).

Executed at Minneapolis, Minnesota this 11th day of January 2021.

s/ Charles D. Moore  
Charles D. Moore, Esq.